



Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-6762

Refer to: 11780203 -- Macoupin County  
Brighton/Brighton Landfill #2

December 7, 1984

Gene Evans  
Brighton Landfill  
1201 Dune Road  
St. Louis, Missouri 63138

Dear Mr. Evans:

Re: Waste Analysis Plan, 35 IL Adm. Code, 729.302

This will acknowledge receipt of the waste analysis plan dated September 28, 1984 that is required by 35 IL Adm. Code 729.302 for Brighton Landfill #2. The Agency notes from your plan that under item #2 of Section II, initial shipments of special/hazardous waste are to be tested for liquids by the paint filter test but that subsequent shipments will only be tested on a "spot check" basis. The Agency considers these "periodic monitoring procedures" to be inadequate in ensuring that your disposal facilities complies with the prohibitions stated in Sec. 729.310. It is the responsibility of the owner or operator of a disposal site to subject each and every container of a particular waste stream to the test(s) outlined in Sec. 729.320 & Sec. 729.321 (if applicable) prior to disposal. In addition, authorizations granted in accordance with 35 IL Adm. Code Sec. 709-729 for existing supplemental waste stream permits require that each and every container of described waste must pass the prescribed test upon receipt at the indicated disposal facility. Currently, new waste stream permits being applied for disposal are also subject to these regulations and the required testing procedures are incorporated as special conditions of the approved permits. Therefore, the disposal site owner and operator are obligated to include these testing criteria in their waste analysis plan. Additionally, in review of Brighton's waste analysis plan, the Agency found that the testing procedures required for determining load-bearing capacities for wastes solidified by sorbents, was not addressed.

EPA Region 5 Records Ctr.

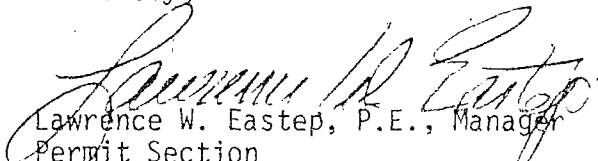


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The Agency also notes that Brighton Landfill is currently permitted to accept only those liquid hazardous wastes or those residuals resulting from the treatment of a liquid hazardous waste that have received authorization from this Agency. To date, our records reveal that only waste stream #s 820868, 920871 & 811968 generated from Olin Corp, Alton, have received authorization for continued disposal at Brighton Landfill. All other permits issued for the subject waste streams (liquids or residuals from treatment of a liquid) became void on July 5, 1984 unless the waste met one of the standards set forth in 35 IL Adm. Code 729.310 and the generator submitted an application for a waste stream authorization by September 4, 1984 (35 IL Adm. Code 709.103 & 709.104). If a generator submitted an application after this effective date, the waste stream application must be approved for authorization by the Agency before these wastes can continue to be disposed of. Therefore, the owner or operator risks disposing of a solid waste without the necessary supplemental permits required under 35 IL Adm. Code 807.210. Also, the owner or operator of a disposal site should bear in mind that the disposal of a solid waste without all necessary permits is a violation of the Environmental Protection Act and Board regulations, and could subject the violator to possible civil and criminal penalties.

Should you have any questions or comments on the above, please call Eugene Theios at 217/782-6762. We believe an amendment to your waste analysis plan is needed. Please respond by February 1, 1985 with any necessary changes.

Sincerely,

  
Lawrence W. Eastep, P.E., Manager  
Permit Section  
Division of Land Pollution Control

LWE:JV:mkb:1/67

cc: Southern Region  
Division File ✓  
Jeanette Virgilio  
Eugene Theios

# BRIGHTON LANDFILL

1201 DUNN ROAD  
ST. LOUIS, MO. 63138  
868-2400

September 28, 1984

Illinois Environmental Protection Agency  
Division of Land Pollution Control  
2200 Churchill Rd.  
Springfield, Ill. 62706

Attention: Mr. Gene Thieos

Gentlemen:

As per our phone conversation of yesterday, we are enclosing a copy of our Compliance Plan for Liquid Hazardous Wastes Prohibitions; Emergency Rule 729.302, for your review.


In accordance with our Compliance Plan Section II: Item (2), the following is a list of special/hazardous waste streams which will be tested.

GENERATOR	WASTE STREAM	AUTHORIZATION NUMBER
AMOCO OIL CO.	CHLORIDE SLUDGE	781861
AMOCO OIL CO.	WATER SOFTENER SLUDGE	811740
AMOCO OIL CO.	WASTE WATER SLUDGE	812325
AMOCO OIL CO.	FILTER CAKE SLUDGE	823099
AMOCO OIL CO.	RUBBER OIL AND OILY SOLIDS	831538
CITY OF GODFREY	WASTE WATER SLUDGE	790431
LACLEDE STEEL CO.	WASTE WATER SLUDGE	781860
MAZE NAIL CO.	CHROME RINSE SLUDGE	832102
OLIN CORP.	COAGULATED SLUDGE	800522
OLIN CORP.	OIL SEPERATOR SLUDGE	800523
OLIN CORP.	LARD OIL & WATER	810408
OILN CORP.	CLARIFLIER SKIMMINGS	810630
OLIN CORP.	Z-6 WASTE WATER SLUDGE	811968
OLIN CORP.	T-242 SUMP SLUDGE	820868
OLIN CORP.	M.R.F. SUMP SLUDGE	820871
OLIN CORP.	Z-17 SETTLING PIT SLUDGE	821073
OLIN CORP.	Z-17 WASTE WATER SLUDGE	821766
PERCISION NATIONAL	CHROME SLUDGE	812515
SHELL OIL CO.	OIL WASTE	810457

If any further information is needed, please contact us.

Very truly yours,

BRIGHTON LANDFILL

  
GENE EVANS  
GE:ds  
Enc:

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COMPLIANCE PLAN

Emergency Rule 729.302

"Liquid Hazardous Wastes Prohibitions"

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## Section I: Introduction

Effective July 1, 1984, 35 Illinois Administrative Code Emergency Rule Part 729.302 prohibits the landfilling of liquid hazardous waste unless specific authorization is obtained from the Illinois Environmental Protection Agency. This rule also includes testing procedures to determine the presence of liquids. This document contains procedures for testing hazardous waste shipments at Brighton Landfill.

Since Brighton Landfill does not presently treat liquid hazardous waste a compliance plan for Emergency Rule Section 729.310(b) is not included. Upon construction of a liquid hazardous waste treatment facility at Brighton Landfill this plan will be amended to comply with Section 729.310.

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## Section II: Waste Screening and Analysis Plan

This section describes the procedures to be followed for testing a shipment of special/hazardous waste received at Brighton Landfill. Since Brighton Landfill only accepts shipments of industrial wastes which have been issued a supplemental permit (waste stream authorization) by the Illinois EPA the test procedures described herein will only be run as a periodic monitoring procedure.

1. Upon arrival of a special/hazardous waste shipment the information on the accompanying manifest will be compared to the IEPA supplemental permit. If no supplemental permit exists for the waste stream or the manifest does not match the waste, it will be returned to the generator.

2. Initial shipments of IEPA permitted special/hazardous waste streams will be tested for liquids per the procedures outlined in paragraph #3. Shipments of routinely accepted special/hazardous wastes will be tested on a monthly "spot check" basis. If results of either the initial test or the "spot check" test yield liquid, the shipment will be returned to the generator. Insofar as Brighton Landfill owns and operates its own hauling firm, stricter control of waste shipments can be maintained. The results of all tests for liquids will be kept in the landfill office.

3. The following procedures will be performed by the landfill manager or his designee based upon the frequency described in paragraph #2.

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M. Rappa Associates, Inc.

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#### A. Apparatus

- Ring stand 10 cm in diameter
- 5 ounce wax-coated paper cups (disposable)
- 400 micron conical paint filter approximately 15 cm in diameter (disposable)
- Watch glass
- Disposable polyethylene gloves
- Wooden tongue depressors (disposable)
- Paper towels (disposable)

#### B. Procedure

- 1) Put disposable polyethylene gloves on both hands.
- 2) Fill a 5 ounce wax-coated paper cup two-thirds full (approximately 3.4 ounces) with a representative sample of the waste. If needed, use a wooden tongue depressor as a spatula when dealing with a sludge.
- 3) Mix the sample thoroughly with the wooden tongue depressor.
- 4) Bring the sample into the office.
- 5) Bring the sample and the paint filter to a temperature of not less than 68°F.
- 6) Place the paint filter in the ring stand. Position paper towels beneath the ring stand.
- 7) Place the sample in the paint filter and cover with the watch glass.
- 8) Maintain the sample and the filter at a temperature of not less than 68°F for five minutes.

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- 9) Observe whether any fluid drops from the bottom of the paint filter during the five minute time period. Should any fluid drop from the bottom of the paint filter, the tested waste is a Liquid Hazardous Waste and therefore is prohibited from being disposed of in a landfill.
- 10) Once waste analysis test is completed, return any waste remaining in the paint filter back to the waste shipment.
- 11) Place used gloves, paper cup, paint filter, tongue depressor, and paper towels into a large plastic bag. Note: When plastic garbage bag is full, take bag to the hazardous waste fill area for disposal.

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